

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: RAMIRO VIDAL RAMIREZ Debtor	CASE NO. 16-06138 (EAG) CHAPTER 13
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OBJECTION TO CONFIRMATION

TO THE HONORABLE COURT:

NOW COMES TRM LLC as service agent for RNPM LLC, through counsel, and most respectfully **STATES** and **PRAYS**:

1. Appearing party is a secured creditor which holds a mortgage over property of the estate.
2. On August 1, 2016, Debtor filed a proposed plan of reorganization.
3. Appearing party objects same because the plan does not provide for payments of pre-petition arrears in the amount of

\$195,537.44 (claim #1) accordingly fails to comply with 11 USC 1322 (b).

4. The proposed plan of reorganization does not comply with the applicable Bankruptcy Law and seems insufficiently funded based on proof of claim filed by appearing party.

5. The plan is not feasible is speculative and does not comply with 11USC 1322 (b,) (2) and (3).

6. Debtor's actions are causing unreasonable delay which is prejudicial to appearing party.

7. Accordingly, confirmation should be denied

WHEREFORE, it is respectfully requested that this motion be granted, with such further relief as is deemed appropriate in the circumstances.

I CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk

of this Court via CM/ECF system, which will electronically send notification of such filing to all the parties who have requested notice.

In San Juan, Puerto Rico, this 26th, day of August, 2016.

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